

Exhibit F

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

MDL 3084: Defendants' Preliminary Responses to Plaintiffs' Requests for Production (Set One)

These preliminary, tentative, and high-level responses to Plaintiffs' Requests for Production (Set One) are provided per the parties' milestones agreement, and solely for the purposes of facilitating the parties' meet and confer process, and in an attempt to informally resolve or narrow disputes that would require Court intervention, and without waiver of any objections or rights, all of which are expressly reserved. Discovery and Uber's investigation are ongoing. Subject to Uber's objections, Uber preliminarily responds:

- **Will Not Search for or Produce Documents Based on Objections:** RFP 14, 16, 17, 27, 108, 111, 113, 114, 127, 128, 131, 135, 142, 157, 166, 173, 176, 177, 178, 189, 190, 191, 192, 194, 195, 196, 199, 200, 202.
- **Will Conduct Searches of Custodial Files, subject to agreement on search terms, and custodians:** RFP 18, 21, 30, 31, 32, 33, 34, 35, 38, 39, 51, 52, 53, 54, 67, 76, 83, 84, 97, 151, 152, 153, 155, 172.
- **Will Conduct Targeted Searches:** RFP 19, 22, 24, 68, 69, 96, 104, 119, 148, 149, 156, 158, 159, 160, 161, 162, 163, 165, 167, 168, 169, 170, 175, 179, 180, 181, 182, 184, 185, 186, 187, 193, 201.
- **Already Produced to MDL Plaintiffs:** RFP 55, 57, 58, 77, 78, 130, 132, 133, 136.
- **Will refer to Produced Responsive DFS Information:** RFP 59, 60, 61, 62, 63, 74, 75.
- **Will Refer to JCCP Productions:** RFP 1, 2, 4, 7, 8, 9*, 10*, 11, 20, 25, 65, 70, 81, 82, 89, 91, 92, 93, 173.
- **Will Refer to PTO 2 Communications re: Data Sources:** RFP 9*, 10*, 12, 13.
- **Will Not Search / Meet and Confer re: Bases for Request:** RFP 3, 56, 86, 94, 95, 98, 99, 103, 106, 107, 112, 117, 118, 121, 123, 124, 125, 126, 137, 138, 139, 140, 141, 147, 174, 188.
- **Will Meet and Confer re: Scope (to narrow/tailor searches):** RFP 15, 23, 26, 28, 29, 36, 37, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 64, 66, 71, 72, 73, 79, 88, 100, 101, 109, 120, 129, 134, 145, 146, 150, 154, 164, 183, 197, 198.
- **Continuing to Investigate:** RFP 5, 6, 80, 85, 87, 90, 102, 105, 110, 115, 116, 122, 143, 144, 171.